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UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,  
  
Plaintiff,  
  
v.  
  
UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
  
Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF THOMAS J.  
PARDINI IN SUPPORT OF  
PLAINTIFF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL ITS OPPOSITION  
TO DEFENDANTS' MOTION IN  
LIMINE NO. 27 TO EXCLUDE PROF.  
HESSELINK'S SAVED  
DEVELOPMENT TIME OPINIONS  
(DKT. 2238)**

I, Thomas J. Pardini, declare as follows:

1. I am a member of the Bar of the State of California and an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Plaintiff Waymo LLC's Administrative Motion to File Under Seal Its Opposition to Defendants' Motion in Limine No. 27 to Exclude Prof. Hesselink's Saved Development Time Opinions (Dkt. 2238).

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit 2	Red Boxes

3. The red boxes of Exhibit 2 contain highly confidential information regarding internal evaluation of a potential LiDAR option by an Uber engineer, as well as estimated LiDAR design costs. This information is not publicly known, and its confidentiality is strictly maintained. I understand that disclosure of this information could allow competitors and counterparties to gain insight into the technical considerations and costs associated with Uber's LiDAR development, allowing them to tailor their own technical development to the detriment of Uber.

4. Defendants' request to seal is narrowly tailored to the portions of Waymo's Opposition and attached exhibits that merit sealing.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 24th day of November, 2017 at San Francisco, California.

/s/ Thomas J. Pardini  
Thomas J. Pardini